

AUG 10 1984 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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SUBJECT:

Pollution Control Screening Visit to Dyess AFB, Abilene, Texas

Michael Jansky
Mike Jansky

FROM:

Environmental Engineer (6ES-FA)

File, Dyess AFB, Abilene, Texas [TX3571924643]

TO:

THRU: Jim Highland *JH*

Federal Facilities Compliance Coordinator (6ES-FA)

On Tuesday, July 31, 1984, Carl Townsend and I visited the subject Federal facility to survey pollution control facilities and activities at the Dyess AFB relative to implementation of Executive Order 12088 and the requirements of the several environmental laws administered by the EPA. Our survey is part of our new regional initiative to screen significant minor Federal Facilities (FF) not currently in the sphere of FF receiving regular compliance inspection by the State and/or EPA. These surveys are intended to surface obvious or apparent problems needing correction or warranting closer investigation through follow-up compliance inspections.

Our primary contact and guide for the survey was Lieutenant Margaret Miller, Base Environmental Coordinator. During the screening survey, we identified no apparent problems or violations at Dyess AFB in the areas of air pollution control, non-hazardous solid waste handling and disposal, pesticide use or handling and activities covered under the Safe Drinking Water Act. However, we did note the following apparent problems, and/or necessary actions relating to NPDES, and RCRA regulated activities.

1. NPDES (Water Pollution Control)

Based upon discussions with the Environmental Coordinator, it appears NPDES Permit Application TX0079316 should be terminated if the facilities served by this application no longer discharge and have been connected to the municipal sewer servicing the city of Abilene. The sources covered by this application include a swimming pool filter backwash and a vehicle washrack. We instructed Lt. Miller to make a request for termination of the aforementioned NPDES permit application and also to supply information certifying the sewer connections. We will await the bases formal request prior to initiating further action on this matter.

2. RCRA Activities

From our discussions with Lt. Miller, it was learned that a Hazardous Waste Inspection - Notice of Violation had been issued to Dyess Air Force Base as result of joint inspection

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performed by Texas Department of Health (TDH), EPA, and the Abilene-Taylor County Health Department. Inspection dates included July 11 and 12, 1983, and January 18, 1984.

The inspection reports submitted indicate Dyess AFB and the Defense Property Disposal Office (DPDO) are both located on the AFB property and at present are using the same TDH and EPA I.D. Numbers. TDH has suggested that Dyess and DPDO submit Notification of Hazardous Waste Activities, EPA Form 8700-12 to EPA Region 6 to acquire separate I.D. numbers to properly identify these two facilities.

In addition to this comment, the TDH Notice of Violation letter date July 2, 1984, listed the following violations to the subchapter regulatory requirement.

1. Underground storage tanks are being used to store hazardous waste. (Refer to Section 325.341(a)(2)).
2. No containment system is provided for aboveground storage areas as required by Section 325.340(f).
3. Containers not marked or improperly marked as required by Section 325.293(a)(2).
4. No Smoking Signs are not posted as required by Section 325.333(f)(2).
5. Contingency and emergency procedure plans have not been submitted to local authorities as required by Section 325.335(b)(3).
6. No closure and post-closure plans were available for review as required by Section 325.338. This failure to have a closure plan and post-closure plan is considered by EPA to be a Class I violation to the RCRA requirements.
7. The surface impoundment used in conjunction with with the firefighting training area is not lined and no groundwater monitoring system is in place or planned as required by Section 325.324(a)(2) and 325.337.
8. Improper freeboard maintained on surface impoundment as required by Section 325.324(b).

In responses to these noted deficiencies, Lt. Miller has prepared the following responses and initiated the below mentioned corrective actions to alleviate these concerns:

ITEM #1 - UNDERGROUND HAZARDOUS WASTE STORAGE TANK:

Tank contents were pumped out, tested and properly disposed of through Defense Property Disposal Office (DPDO) on June 25, 1982. The tank is located in a controlled area and padlocked to prohibit further use until its removal in fiscal year 1987 under Phase IV of the Air Force's Installation Program (Project No. FNWZ 87-3005). [The locked tanks were observed during our visit.]

ITEM #2 - CONTAINMENT SYSTEMS:

Reinforced concrete containment systems for two of three hazardous materials accumulation sites (Bldg 5017 and 5003) will be constructed in August and September of 1984, respectively. The third containment system at Bldg 4311 will be provided in fiscal year 1986 under Dyess Project No. FNWZ 86-0015.

ITEM #3 - IMPROPERLY MARKED CONTAINERS:

Since THD's last visit, the containers have been properly marked. [The newly marked containers were observed during our visits.]

ITEM #4 - NO SMOKING SIGNS:

At hazardous waste sites, "Flammable Liquid" signs are posted. Dyess is adding "No Smoking Signs" also, and these will be in place by the end of August 1984. [The new signs were observed during our visit.]

ITEM #5 - CONTINGENCY & EMERGENCY PLANS:

Contingency and emergency plans for the containment sites will be submitted upon their completion. In the meantime, interim plans will be available for review by the first of October 1984.

The Hazardous Materials/Waste Holding Facility, sited at DPDO, is in the design phase. When final building configuration (95% design due in November), is completed, Dyess will submit the plan to TDH.

ITEM #6 - CLOSURE & POST CLOSURE PLANS:

As in Item #5, pending until Dyess AFB can provide TDH with a completed plan of the Hazardous Material/Waste Holding Facility.

ITEMS 7 & 8 - SURFACE IMPOUNDMENT:

The upgrade of Dyess surface impoundment area is included in Phase IV of Dyess Installation Restoration Program (IRP).

Based upon our discussion with Lt. Miller and the Base Vice Commander Col. G. R. Hyatt III, it appears substantive progress is being made to bring the facility into RCRA compliance. Since the DPDO facility appears to be the most critical and potentially controversial area needing further improvement, we conclude that an expeditious completion of the DPDO Hazardous Materials/Waste Holding Facility would greatly aid in the early overall resolution of the RCRA violations now cited.

cc: Taylor (6AW-HE)
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